



February 12, 2009

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

RE: EB Docket No. 06-36
Annual CPNI Certification for Year 2008

Dear Ms. Dortch:

In accordance with Public Notice DA 09-9, issued on January 7, 2009, attached is the annual CPNI certification filing for the year of 2008, pursuant to 47 C.F.R § 64.2009(e), for Stanton Telecom, Inc. and Stanton Long Distance, LLC.

Sincerely,

A handwritten signature in brown ink that reads "Robert J. Paden". The signature is written in a cursive style.

Robert J. Paden
Vice President/General Manager

Attachment

cc: Best Copy and Printing, Inc.
445 12th Street
Suite CY-B402
Washington, D.C. 20554

STANTON TELECOM, INC.
P.O. BOX 716
1004 IVY STREET
STANTON, NE 68779-0716
402-439-2264
FAX: 402-439-7777

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for: 2008

Date filed: February 12, 2009

Name of company(s) covered by this certification and Form 499 Filer IDs:

Stanton Telecom, Inc. – 801165
Stanton Long Distance, L.L.C. – 822946

Name of signatory: Robert J. Paden

Title of signatory: Vice President/General Manager

I, Robert J. Paden, certify that I am an officer of the Companies named above, and acting as an agent of the Companies, that I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Companies' procedures ensure that the Companies are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Companies have not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. If the Companies obtain any information with respect to the processes pretexters are using to attempt to access CPNI, they will report that information along with what steps the Companies are taking to protect CPNI.

The Companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



Attachment

STATEMENT

Stanton Telecom, Inc. and Stanton Long Distance, LLC (the "Companies") have established operating procedures that ensure compliance with the Federal Communications Commission regulations regarding the protection of customer proprietary network information ("CPNI"). These procedures include but are not limited to:

- The Companies have established authentication procedures.
- The Companies have a process to notify customers of account changes.
- The Companies have a process for reporting breaches.
- The Companies have implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- The Companies continually educate and train their employees regarding the appropriate use of CPNI. The Companies have established disciplinary procedures should an employee violate the CPNI procedures established by the Companies.
- The Companies maintain a record of their and their affiliates' sales and marketing campaigns that use their customers' CPNI. The Companies also maintain a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered as a part of the campaign.
- The Companies have established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintain records of the Companies compliance for a minimum period of one year. Specifically, the Companies' sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding their CPNI, and a process ensures that opt-out elections are recorded and followed.